

United States Courts
Southern District of Texas
FILED

JUN 03 2019

David J. Bradley, Clerk of Court

A091 (Rev. 8/01) Criminal Complaint

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

Vs.

Ricardo Roberto Reynoso

CRIMINAL COMPLAINT

Case Number: V-19-46M

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about June 2, 2019 in Calhoun County, in the Southern District of Texas defendant, Ricardo Roberto Reynoso

did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324
I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:
Official Title

See Attached Affidavit of U.S. Border Patrol Agent

Juan Rojas

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

Juan Rojas
Signature of Complainant
Juan Rojas
Printed Name of Complainant

June 3, 2019

Date

at

Corpus Christi, Texas
City and StateJason B. Libby U.S. Magistrate Judge

Name and Title of Judicial Officer

Jason B. Libby
Signature of Judicial Officer

AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

FACTS/PROBABLE CAUSE:

On June 1, 2019 at approximately 7:33 PM, Port Lavaca Police Department conducted a traffic stop on a Chevrolet Impala for expired vehicle registration near Port Lavaca, Texas. After a brief interview, the driver, Ricardo Roberto Reynoso, said he was traveling to Houston with the three passengers. He was going to leave them and the car in Houston and take the bus back home. Reynoso could not explain where he met the occupants or how he knew them. Reynoso does not know who owns the vehicle. At that point, the Corpus Christi Border Patrol station was contacted.

A Border Patrol Agent telephonically interviewed Reynoso and the three passengers. The driver, REYNOSO, was determined to be a United States Citizen. The three subjects were determined to be citizens and nationals of Guatemala and Mexico without any immigration documents allowing them to be, remain or enter the United States legally. Agents were dispatched to the Calhoun County Jail to take custody of all four subjects.

PRINCIPAL MIRANDA WARNING:

Principal: Ricardo Roberto Reynoso

Ricardo Roberto Reynoso was read his Miranda Rights and Warnings in his preferred language of English. Reynoso signed the form stating that he read and understood his rights but did not agree to make a statement without a lawyer present.

MIRANDA WARNINGS MATERIAL WITNESS:

Material Witness: Edgar Ramon Martinez-Villa

Edgar Ramon Martinez-Villa was read his Miranda Rights and Warnings in his preferred language of Spanish. Martinez signed the form stating that he read and understood his rights and agreed to make a statement without a lawyer present.

MATERIAL WITNESS VIDEO STATEMENT:

Material Witness: Edgar Ramon Martinez-Villa

Martinez-Villa stated he entered the United States a few months ago by crossing the Rio Grande River near Brownsville, Texas. Martinez-Villa stated after he entered the United States, the smugglers abandoned him and he went to an immigrant house located in Brownsville, Texas and asked for help. Martinez-Villa stated while there he met a man whom Martinez-Villa began to work for doing carpentry work. He was able to save up enough money to get smuggled north to Houston, Texas. His wife was put in contact with a smuggler who they called "El Dientes".

He was eventually taken to a trailer in McAllen. He was there for a week before he was loaded up and taken north. Martinez-Villa stated he and the other two aliens initially got inside the passenger area of the vehicle, but once it began moving, they lowered down the back seats and climbed in the trunk.

Martinez-Villa stated they crossed the checkpoint while in the trunk. They were told not to make noise. They were in the trunk for approximately 40 minutes. Martinez-Villa said he began to bang on the car to get the driver's attention. It was not until 10 minutes later, after crossing the checkpoint, that the driver stopped, lowered the rear seat, and told them to get out. They made one stop at an unknown gas station before continuing north and being encountered by the police.

Martinez-Villa was asked if he could identify the driver of the vehicle. Martinez-Villa was then shown a photo lineup in which he identified Ricardo Roberto REYNOSO as the driver of the vehicle.

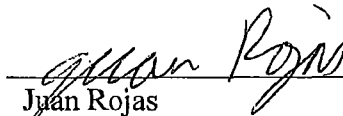
MIRANDA WARNINGS MATERIAL WITNESS:

Material Witness: Samuel Enriquez Lopez-Orellana

Samuel Enriquez Lopez-Orellana was read his Miranda Rights and Warnings in his preferred language of Spanish. Lopez signed the form stating that he read and understood his rights but did not agree to make a statement without a lawyer present.

DISPOSITION:

The facts of this case were presented to Assistant United States Attorney Sara Popejoy who accepted prosecution on Ricardo Roberto Reynoso for violating Title 8 USC 1324, alien smuggling. Edgar Ramon Martinez-Villa and Samuel Enriquez Lopez-Orellana are being held as material witnesses in this case.



Juan Rojas
Border Patrol Agent

Submitted by reliable electronic means, sworn to,
signature attested telephonically per Fed.R.Crim.P.4.1,
and probable cause found on the



Jason B. Libby
United States Magistrate Judge